

**To:** Tuers, Charis[ctuers@blm.gov]; Russ, Timothy[Russ.Tim@epa.gov]; Bohan, Suzanne[bohan.suzanne@epa.gov]  
**Cc:** Darla Potter[darla.potter@wyo.gov]; Tina Anderson[Tina.Anderson@wyo.gov]  
**From:** Jackson, Scott  
**Sent:** Wed 9/11/2013 5:55:15 PM  
**Subject:** RE: Revised Conformity Exemption List for the UGRB ozone nonattainment area

Hi Charis,

Thank you for the opportunity to review of the BLM's latest proposed general conformity Exemption list (file "Conformity Exemption List Based on 40 CFR 93 Section 153 August 2013.pdf"). We look forward to the meeting on 9/16 to discuss things further. In the meantime, we wanted to provide you with our initial thoughts/reactions to the latest list. We based our review with respect to the comments previously sent by Suzanne Bohan on June 11, 2013, on the prior version of the proposed exemption list, and offer the following preliminary comments for consideration by BLM:

1.)

**Referred to BLM**

**Referred to BLM**

Referred to BLM

We note that our prior June 11, 2013 comment on this type of category for a proposed exemption was as follows:

"For activities that are proposed to be exempt because they meet the requirements of 40 CFR 93.153(c)(2), we recommend that the BLM demonstrate that the emissions from the proposed exempt activity causes no emissions increase or the emissions increase is historically or typically below the de minimis levels. This information and rationale will help us evaluate the proposed list."

In view of our prior comment, we are unable to discern how the statement

**Referred to BLM**

**Referred to BLM**

addresses the applicable emissions thresholds in WAQSR Chapter 8, Section 3(c)(ii)(A) and 40 CFR 93.153(b)(1). A suggestion we can offer would be for the BLM to document and keep on file the annual estimated emissions from this activity, and those that are similar, and include a note in the comment column of the exemption table to the effect that the emissions from such an activity would not exceed those levels as stated in WAQSR Chapter 8, Section 3(c)(ii)(A) and 40 CFR 93.153(b)(1).

2.)

**Referred to BLM**

**Referred to BLM**

# Referred to BLM

Referred to BLM we are unable to evaluate if our prior June 11, 2013 comments were addressed; those comments are provided below for reference:

"BLM is proposing that many well/production activities would be considered exempt pursuant to the 40 CFR 93.153(d)(1) exemption for stationary sources which have a NSR or PSD permit as part of a SIP-approved permitting program. We recommend that the BLM verify that these activities meet the requirements of this exemption. Wyoming DEQ issues Chapter 6 air quality permits for sources that do not qualify as stationary sources for the purposes of the 40 CFR 93.153(d)(1) exemption.

Also, we recommend that the BLM provide a rationale for determining Referred to BLM

Referred to BLM

Referred to BLM

It would be helpful to have a further description

Referred to BLM

Referred to BLM

such as workovers, blowdowns, and flaring.

Referred to BLM

Referred to BLM

temporary and may all occur as a new well is being completed and brought on to production.

These would appear to be, at times,

Referred to BLM

Referred to BLM however, we welcome further clarification from the BLM's perspective. We also recommend including more detailed descriptions of several sources which appear in the

Referred to BLM

category to clarify what exactly is being included

Referred to BLM

Referred to BLM

Thanks again for the opportunity to review the latest version of the exemption list and please let me know if you have any questions prior to our meeting on 9/16.

Scott

---

Scott Jackson, Unit Chief

Indoor Air, Toxics and Transportation Unit  
U.S. EPA Region 8

1595 Wynkoop Street (8P-AR)

Denver, Colorado 80202-1129

(303) 312-6107

**From:** Tuers, Charis [mailto:ctuers@blm.gov]

**Sent:** Tuesday, August 27, 2013 4:40 PM

**To:** Jackson, Scott; Russ, Timothy; Bohan, Suzanne

**Cc:** Darla Potter; Tina Anderson; Jeni Cederle-WDEQ-AIR; Brian Hall

**Subject:** Revised Conformity Exemption List for the UGRB ozone nonattainment area

# Refer to BLM

**Charis A. Tuers**

**Air Resource Specialist**

**Bureau of Land Management**

**Wyoming State Office**

**(307) 775-6099**

**[ctuers@blm.gov](mailto:ctuers@blm.gov)**